



Recd.
Rec. Mgmt.
May 25, 2000

Department of Energy
Ohio Field Office
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, NY 14171-9799

DW:2000:0403

May 24, 2000

Mr. Robert R. Campbell, President
West Valley Nuclear Services Company
10282 Rock Springs Road
West Valley, NY 14171-9799

ATTENTION: J. R. Gerber, Environmental Affairs Manager, AOC-24

SUBJECT: Environmental Checklist OH-WVDP-2000-04, "Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications"

REFERENCE: WD:2000:0340 (71827), J. R. Gerber to B. A. Mazurowski, "Environmental Checklist OH-WVDP-2000-04, 'Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications,'" dated May 3, 2000

Dear Sir:

The Ohio Field Office West Valley Demonstration Project National Environmental Policy Act (NEPA) Compliance Officer has reviewed the subject environmental checklist and determined that the action described therein is categorically excluded from the requirement to prepare additional NEPA documentation in the form of either an Environmental Assessment or Environmental Impact Statement.

Enclosed is a signed Environmental Checklist/Action Description Memorandum Form and attachment to the Environmental Checklist.

Sincerely,

Daniel W. Sullivan
NEPA Compliance Officer

Enclosure: Environmental Checklist/Action Description Memorandum Form and Attachment

cc: H. R. Moore, OH/WVDP, WV-DOE, w/o enc.
T. J. Vero, OH/WVDP, WV-DOE, w/o enc.

DWS:094 - 71919 - 451.7

DWS/bma

Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

Project/Activity Title: Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications	NEPA ID Number: OH-WVDP-2000-04	Rev. #: 0	Date: 05/02/00
Contractor Project Manager: Frank A. Tarantello / David K. Floetz	Phone Number: (716) 942-2025 / (716) 942-4276		
Contractor NEPA Coordinator: Scott C. Thompson	Phone Number: (716) 942-4181		
OH/WVDP NEPA Document Manager: Daniel W. Sullivan	Phone Number: (716) 942-4016		

A. BRIEF PROJECT/ACTIVITY DESCRIPTION: Attach a detailed description or statement of work.

B. SOURCES OF IMPACT: Would the action involve, generate, or result in changes to any of the following?

	YES	NO		YES	NO
1. Air Emissions	X		12. Water Use/Diversion		X
2. Liquid Effluents		X	13. Water Treatment		X
3. Solid Waste	X		14. Water Course Modification		X
4. Radioactive Waste/Soil		X	15. Radiation/Toxic Chemical Exposures	X	
5. Hazardous Waste		X	16. Pesticide/Herbicide Use		X
6. Mixed Waste		X	17. High Energy Source/Explosives		X
7. Chemical Storage/Use	X		18. Transportation		X
8. Petroleum Storage/Use		X	19. Noise Level	X	
9. Asbestos		X	20. Workforce Adjustment	X	
10. Utilities		X	21. Other		X
11. Clearing or Excavation	X				

In an attachment, qualify and explain each question that you have specifically answered "YES."

C. CATEGORY EVALUATION CRITERIA: Would the proposed action:

	YES	NO
1. Take place in an area of previous or ongoing disturbance?	X	
2. Create hazardous, radioactive or mixed waste for which no disposal is available?		X
3. Impact a RCRA-regulated unit or facility?	X	
4. Force a low income or ethnic minority population to shoulder a disproportionate share of the negative environmental impacts of pollution or environmental hazards because of a lack of political or economic strength?		X
5. Involve air emissions and be located in an air pollutant non-attainment or maintenance area for any criteria pollutants?		X
6. Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive Orders? (i.e., require any federal, state or local permits, approvals, etc.)?		X
7. Disturb hazardous substances, pollutants or contaminants that pre-exist in the environment such that there would be uncontrolled or unpermitted releases?		X
8. Require siting, construction, or major expansion of a waste storage, disposal, recovery, or treatment facilities, including such categorically-excluded facilities?		X
9. Adversely affect environmentally sensitive resources including, but not limited to: structures of archeological, historic or architectural significance; threatened or endangered species or their habitat; floodplains or wetlands; wildlife refuges, agricultural lands or vital water resources(e.g., sole-source aquifers)?		X
10. Involve extraordinary circumstances? As specified at 10 CFR § 1021.410(b)(2), extraordinary circumstances are unique situations presented by specific proposed actions, such as scientific controversy about the environmental effects of the action, uncertain effects or effects involving unique or unknown risks, or unresolved conflicts concerning alternate uses of available resources within the meaning of Section 102(2)(E) of NEPA (42 U.S.C. 4332(2)).		X
11. Be "connected" to other actions with potentially significant impacts, related to other proposed actions with cumulatively significant impacts, and precluded by 40 CFR § 1506.1 or 10 CFR § 1021.211?		X

In an attachment, qualify and explain each question that you have specifically answered "YES."

U.S. Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

D. RECOMMENDATION AND DETERMINATION

DOE OH/WVDP Director's Recommendation: I find and recommend that this proposed action meets the criteria specified in 10 CFR § 1021, Subpart D, and/or DOE Policy and Guidance for the following:

- [X] Categorical Exclusions (Appendix B, Class of Action B6.6)
[] Actions Within the Scope of Existing NEPA Documentation
 (NEPA Document ID Number _____)
[] On-going Operations (Standard Operating Procedure OH-6.1.01, Rev. 1, Section 5.2)

Signature: _____ Date _____
Director, Ohio Field Office,
West Valley Demonstration Project (OH/WVDP),
Department of Energy

DOE OH/WVDP NEPA Compliance Officer's Determination: Based on my review of the attached information concerning this proposed action, as the OH/WVDP NEPA Compliance Officer (DOE Order 451.1A, Section 5.d.), I have determined that the proposed action fits within the specified class of actions, that the other regulatory requirements identified in Section C are met, and that this proposed action proceed without further NEPA review.

Signature: *Daniel W. Sullivan* Date 5/22/2000
OH/WVDP NEPA Compliance Officer,
West Valley Demonstration Project

OR

- [] Environmental Assessments (Appendix C, Class of Action _____; or Action not listed in Subpart D)
[] Environmental Impact Statements (Appendix D, Class of Action _____)
[] Interim Actions (40 CFR § 1506.1 and 10 CFR § 1021.211)
[] Integrated Documentation for CERCLA/RCRA Actions
[] Variances (Emergency Action, 40 CFR § 1506.11 and 10 CFR § 1021.343)

DOE-OH NEPA Compliance Officer's Concurrence: I concur with the recommendation that this proposed action fits within the specified class of actions.

Signature: _____ Date _____
NEPA Compliance Officer,
Ohio Field Office,
Department of Energy

DOE-OH Manager's Determination: Based on my review of the attached information concerning this proposed action, as the Head of the Ohio Field Office (DOE Order 451.1A, Section 5.a.), I have determined that the level of documentation recommended for the proposed action is appropriate.

Signature: _____ Date _____
Manager, Ohio Field Office,
Department of Energy

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

A. BRIEF PROJECT/ACTIVITY DESCRIPTION:

BACKGROUND

From 1966 to 1972, Nuclear Fuel Services, Inc. (NFS), operated a nuclear fuel reprocessing plant at the Western New York Nuclear Service Center (WNYNSC) - a 3,345-acre reservation located near West Valley, New York (**Figure 1**). The plant, which reclaimed uranium and plutonium from spent nuclear fuel, generated approximately 600,000 gallons of liquid high-level radioactive waste (HLW), which was subsequently stored in underground tanks.

In 1980, the U.S. Congress passed the West Valley Demonstration Project (WVDP) Act, directing the U.S. Department of Energy (DOE) to: (1) solidify the HLW at the WNYNSC in a form suitable for transportation and disposal; (2) develop containers for the HLW that are suitable for permanent disposal; (3) transport the solidified HLW, in accordance with applicable provisions of law, to an appropriate Federal repository for permanent disposal; (4) in accordance with applicable licensing requirements, dispose of low-level radioactive waste (LLW) and transuranic (TRU) waste produced as a result of solidifying the HLW; and (5) decontaminate and decommission - (a) the tanks and other facilities of the WNYNSC in which the HLW solidified under the Act is stored; (b) the facilities used in the solidification of the waste; and (c) any material and hardware used in connection with the WVDP, in accordance with requirements that the Nuclear Regulatory Commission (NRC) prescribes (Public Law 96-368).

Since June 1998, the liquid HLW has been solidified (immobilized) in borosilicate glass as a result of vitrification, and stored on-site in approved canisters until its removal is authorized by DOE (DOE/EIS-0081). While HLW tank heel removal and vitrification remain the top priority of the DOE, the WVDP has turned its attention and shifted its resources to the remaining requirements of the WVDP Act, waste disposal and facility decontamination and decommissioning (WVDP-336).

Through the mid-1980s, the WVDP disposed of Project wastes in an on-site NRC-licensed disposal area (NDA). Project equipment, anti-contamination clothing, and contaminated soils were buried in the NDA. In 1987, an intervenor-filed lawsuit challenged the validity of DOE's finding of no significant impact (FONSI), which was based on an environmental assessment for disposal of Project LLW (DOE/EA-0295). The DOE and intervening party reached a settlement of compromise wherein DOE agreed to cease all on-site disposal activities. The terms of the settlement prohibited the DOE from further disposal at the WVDP until the completion of an environmental impact statement or specific approval by the NRC. To comply with the settlement, LLW produced by waste management activities is now stored in above-ground temporary lag storage areas, which include the Lag Storage Building (LSB), Lag Storage Additions (LSA) # 1, 3, and 4, and the Chemical Process Cell-Waste Storage Area (CPC-WSA) (**Figure 2**).

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

The CPC-WSA was erected in 1985 for the purpose of storing wastes that were generated as a result of decontaminating the Chemical Process Cell (CPC), located in the defunct nuclear fuel reprocessing plant (e.g., radioactively contaminated piping and vessels). The CPC-WSA originally consisted of a sprung-tent structure erected on a gravel pad (HB:85:0108). The temporary storage area was established, because, at that time, the WVDP did not have the capability to decontaminate or size reduce the waste: higher activity wastes have to be handled remotely (i.e., cannot be handled directly) to ensure that the radiation exposure that workers receive is as low as reasonably achievable (ALARA). These types of waste include, but are not limited to, Class B and C LLW, mixed LLW, Greater-Than-Class-C waste, and TRU waste. In 1999, the WVDP undertook the design and construction of a facility for remotely processing waste, which, among other functions, has these capabilities (OH-WVDP-1999-03).

In 1996, toward the end of the sprung-tent's design life, the CPC-WSA was replaced with a galvanized steel-panel enclosure (ID-WVDP-94-16). Under Title 6, New York Code of Rules and Regulations (NYCRR) § 373-3.9, "Use and Management of Containers," storage units for hazardous waste containers, including mixed waste containers, must be inspected on a weekly basis for leaking containers and for deterioration of containers from corrosion and other factors. During several such weekly inspections of mixed LLW containers stored in the CPC-WSA, water was observed inside of the CPC-WSA structure. In particular, during the latter part of 1999, an accumulation of water was observed on some of the waste container lids. During a subsequent quarterly engineering evaluation of the mixed waste containers, the source of this water was identified as "rainwater" leaking through bolt holes in the galvanized-steel paneling. Analysis of direct sampling (swipes and particulate) of the waste containers, adjacent areas, and gravel found activity at background levels. The engineering evaluation concluded that there was no evidence of container integrity compromise (CP:2000:0001).

TYPE AND SCOPE OF ACTIVITY

The proposed action evaluated in this environmental checklist involves repairing the leaks in the CPC-WSA, and installing an industrial entrance on the northeast end of the structure to provide equipment access to the waste containers. Three alternatives have been proposed for repairing the leaks:

- I. Disassemble the CPC-WSA structure, as necessary, to replace the bolt/washer assemblies that fasten the galvanized-steel panels to the CPC-WSA frame;
- II. Apply a spray-on sealant coating directly to the structure; or
- III. Disassemble the structure, as necessary, to coat the structural members with the spray-on sealant.

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

Under Alternatives I and III, the existing hardstand areas adjacent to the CPC-WSA would be utilized as lay down for the disassembled structure (**Figure 2**).

PURPOSE AND NEED

The leaks in the CPC-WSA structure would be repaired to minimize the deterioration of containers from corrosion and other factors (6 NYCRR § 373-3.9).

The industrial entrance would be installed so that the waste containers could be removed from the CPC-WSA without having to partially disassemble the structure each time containers were removed; and subsequently processed as part of the Remote-Handled Waste Project (OH-WVDP-1999-03).

SCHEDULE/TIMING

The leak repair is tentatively scheduled to start in May 2000. The leak repair would take approximately three months to complete. The industrial entrance installation would be performed in conjunction with the leak repair, and would take approximately two weeks to complete.

SECTION B. SOURCES OF IMPACT:

Table I summarizes the sources of impacts associated with each alternative for repairing the leaks. The sources of impacts associated with the industrial entrance installation are specifically identified under each applicable subsection of Section B of this environmental checklist (e.g., **Section B.11 Clearing and Excavation** addresses the clearing and excavation activities associated with anchoring the northeast wall of the CPC-WSA to structurally support the industrial entrance).

TABLE I. Summary of Sources of Impacts for Leak Repair Alternatives

SOURCES OF IMPACT	ALTERNATIVE I: disassemble and replace bolt/washer assemblies	ALTERNATIVE II: coat structure with a spray-on sealant	ALTERNATIVE III: disassemble and coat structural members with the spray-on sealant
Air Emissions		●	●
Solid Waste	●	●	●
Chemical Storage/Use		●	●
Radiation/Toxic Chemical Exposure	●	●	●
Noise Level	●	●	●
Workforce Adjustment	●	●	●

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

1. Air Emissions - Sources of nonradioactive air emissions are regulated by the New York State Department of Environmental Conservation (NYSDEC), pursuant to 6 NYCRR § 201, "Construction and Operating Permits." There would be minor CO and CO₂ emissions from the intermittent operation of diesel-powered air compressors and other construction equipment, such as cranes and bucket excavators, during the CPC-WSA modification activities. Under 6 NYCRR § 201-3.3, "Trivial Activities - Mobile Sources and Mobile Sources Related (10)," combustion-engine exhaust emissions from construction vehicles/ equipment do not require a permit if the sources are operated in a manner consistent with good engineering practices. Similarly, with respect to emissions of volatile organic compounds (VOCs), under 6 NYCRR § 201-3.2, "Exempt Activities - Industrial (31)," surface coating operations which are specifically exempted from regulation under 6 NYCRR § 228, "Surface Coating Processes," are exempt from permit. As specified in 6 NYCRR § 228.8, Table 2, Urethane coatings with 3.8 lbs/gal (450 g/l) or less are exempt. Under Alternatives II and III for the leak repair, a two-part aliphatic Polyurethane coating system, consisting of a primer coat and top coat, would be utilized to seal the CPC-WSA structure. With respect to VOCs, the primer coat contains 3.3 lbs/gal (400 g/l) VOCs and the top coat contains 1.9 lbs/gal (222 g/l) (See Section B.7. Chemical Storage/Use).

3. Solid Waste - Under Alternative I for the leak repair, approximately 15.0 cubic feet (0.60 cubic yards) of solid waste would result from replacing the bolt/washer assemblies that fasten the galvanized-steel paneling to the CPC-WSA frame. Under Alternatives II and III, chemical containers would be emptied as a result of applying the spray-on sealant coating (See Section B.7. Chemical Storage/Use). Similarly, to make way for the industrial entrance, steel paneling, ventilation louvers, and sections of the steel frame would be removed from the northeast end of the CPC-WSA. Solid wastes generated as a result of the proposed action, including the empty chemical containers, would be managed in accordance with Standard Operating Procedure (SOP) 300-07, "Waste Status Determination," SOP 009-12, "Solid Waste Management and Material Reuse and Recycling," and SOP 300-11, "Off-Site Transportation of Industrial Waste and Recyclable Materials."

7. Chemical Storage/Use - Under Alternatives II and III for the leak repair, a two-part aliphatic Polyurethane coating system, consisting of a primer coat and top coat, would be utilized to seal the CPC-WSA structure. To achieve a 0.030-inch (30-mil) thick coating over the 32,350-ft² (3,594-yd²) surface of the CPC-WSA (ASTM C836-95) would require the application of approximately 600 gallons (2,271 liters) of coating material - a single coat of the primer and two coats of the top coat, i.e., approximately 200 gallons (757 liters) per coat. On-site storage and usage of the coating material would be inventoried and reported in accordance with WV-916, "SARA [Superfund Amendments Reauthorization Act] Title III Section 311, 312, and 313 Reporting."

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

11. Clearing and Excavation - The existing screw-type anchors for the northeast wall of the CPC-WSA would be relocated to accommodate the industrial entrance. Removing and relocating these anchors could require some clearing and excavation if an anchor could not be screwed out and, therefore, had to be dug out). After the anchors were relocated, a section of the existing steel beam across the bottom of the wall would be removed to make way for the entry way. Each cleared and/or excavated area would be covered with stone to establish a level (i.e., at grade) pathway for the equipment utilized to move the waste containers. Approximately 260 cubic feet (10.0 cubic yards) of soil and gravel could be disturbed as a result of the clearing and excavation, which correlates to a surface disturbance of approximately 130 square feet (0.0030 acres). Based on historical knowledge of the CPC-WSA area, contaminated soil should not be encountered during the clearing and excavation activities. Notwithstanding, if contaminated soil were encountered, it would be managed in accordance with WVDP-304, "Technical Basis for Contaminated Soil Management." In addition, 9,000 cubic feet (333 cubic yards) of stone would be laid north of the existing gravel area at the northeast end of the CPC-WSA to establish a turnaround for the industrial entrance.

Best Management Practices would be implemented to prevent or minimize sediment and/or erosion related impacts to storm water run-off from the clearing and excavation (WVDP-206). During the clearing and excavation activities, erosion and storm water run-off controls (e.g., siltation fences, hay bales, diversion trenches) would be employed along the northeast side of the CPC-WSA as a mitigative measure to minimize potential impacts to nearby wetlands from soil erosion. In 1993, an investigation was conducted to identify and delineate Clean Water Act (33 U.S.C. 1251 et seq.), Section 404, jurisdictional wetlands and/or wetlands that might be regulated by the State of New York within the 220-acre area designated as the WVDP premises (33 CFR §§ 323 - 325). As a result of this investigation, a wetland unit was identified north of the CPC-WSA [Wetland Unit 44(AD)].

15. Radiation/Toxic Chemical Exposure - Worker exposure to radioactive and toxic airborne contaminants would be controlled in accordance with the requirements of the WVDP Radiological Controls Manual (WVDP-010) and Industrial Hygiene and Safety Manual (WVDP-011). Personal protective equipment (PPE) and engineering controls would be utilized to minimize worker exposure (e.g., supplied breathing air, radiation shielding). Under Alternative II, a twenty-foot long spray wand would be utilized to apply the Polyurethane coating from a remote location below or beside the radiation field above the CPC-WSA. Although individual exposures would depend on the duration of the work and proximity of the workers to the waste containers in the CPC-WSA, all exposures would be maintained ALARA and in compliance with applicable state and federal regulations as well as DOE Orders, as implemented by the WVDP Radiological Controls Manual (WVDP-010) and Industrial Hygiene and Safety Manual (WVDP-011). The individual dose to workers would not exceed the administrative control limits of 100 millirem (mrem)/day and 500 mrem/year (WVDP-010).

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

19. Noise Level - Increased noise levels would result from utilizing portable air compressors for applying the spray-on sealant and/or for powering pneumatic tools. Air compressor noise tends to be broad band and continuous. The noise levels would be of short duration and probably would not exceed 85 dB(A) TWA (decibel level measured on the A scale as a time weighted average over an eight-hour day). Applicable federal and state regulations and DOE Orders, as implemented by contractor safety procedures, would be observed during activities expected to generate elevated noise levels.

20. Workforce Adjustment - The CPC-WSA leak repairs and industrial entrance installation would be performed by a commercial vendor. There would be a workforce increase of approximately three-to-eight employees for the duration of the CPC-WSA modifications (i.e., the vendor's crew). Notwithstanding, the workforce adjustments would not require an upgrade or expansion of any existing site utilities or services (e.g., office space, break areas, restrooms).

SECTION C. CATEGORY EVALUATION CRITERIA:

1. Take place in an area of previous or on-going disturbance?

The proposed action would take place in an area of previous or on-going disturbance (**Figures 2**).

3. Impact a RCRA-regulated unit or facility?

The leak repair and industrial entrance installation would not adversely impact the CPC-WSA, a Resource Conservation and Recovery Act (RCRA)-regulated unit. The WVDP has been operating under RCRA interim status for treatment and storage of hazardous waste since June 1990. The current RCRA Part A Application identifies the CPC-WSA as a container storage unit (S01). In 1993, under the Federal and State Facility Compliance Agreement (FSFCA), 12 boxes and 10 SUREPAKS stored in the CPC-WSA were identified as mixed waste (Docket No. II, RCRA-93-0207). The proposed action does not involve the handling of waste containers; nevertheless, a Risk Management Plan has been established to identify response actions for actual or potential release of radiological, hazardous or mixed waste constituents, for example, if the integrity of a container were breached during the disassembly of the CPC-WSA structure (IH:99:0059). Moreover, the proposed action does not constitute an expansion of the facility and, as such, does not require a modification to the RCRA Part A Permit Application (See Section A. **Brief Project/Activity Description: Type and Scope of Activity**). Under the RCRA 3008(h) Administrative Order on Consent, the CPC-WSA has been designated a Solid Waste Management Unit (SWMU #14) and Super Solid Waste Management Unit (SSWMU #7) (Docket No. II, RCRA-3008(h)-92-0202). Based on the RCRA Facility Investigation (RFI) Report for the CPC-WSA, relocating the anchors for the northeast wall of the CPC-WSA would not disturb hazardous substances, pollutants or contaminants that pre-exist in the environment such that there would be an uncontrolled or unpermitted release (WVDP-RFI-023). In addition, relocating the anchors would not adversely impact ground-water monitoring down gradient of the container storage/solid waste management unit.

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

SECTION D. RECOMMENDATION AND DETERMINATION:

A categorical exclusion (CX) is recommended for the proposed action. Repairing leaks and installing an industrial entrance in the CPC-WSA steel-panel enclosure fall within the class of actions described in 10 CFR § 1021, Subpart D, Appendix B, CX B6.6, "Modification (excluding increases in capacity) of an existing structure used for storing, packaging, or repacking waste other than high-level radioactive waste or spent nuclear fuel, to handle the same class of waste as currently handled at that structure."

**Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications**

SUPPORTING DOCUMENTS

ASTM C836-95	American Society for Testing and Materials, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course," copyrighted 2000
CP:2000:0001	E.M. Ciancone to distribution, "Quarterly Engineering Evaluation of Mixed Waste Containers in CPC/WSA," dated January 13, 2000
Docket No. II, RCRA-3008(h)-92-0202	U.S. Environmental Protection Agency, "West Valley Order, Docket No. II RCRA-3008(h)-92-0202," dated March 9, 1992
Docket No. II, RCRA-93-0207	New York State Department of Environmental Conservation, "Federal and State Facility Compliance Agreement," dated March 25, 1993
DOE Order 451.1A	U.S. Department of Energy, "National Environmental Policy Act Compliance Program," dated June 5, 1997
DOE/EA-0295	U.S. Department of Energy, "Environmental Assessment for Disposal of Project Low-Level Waste, West Valley Demonstration Project," and associated finding of no significant impact (FONSI), dated April 1986
DOE/EIS-0081	U.S. Department of Energy, "Final Environmental Impact Statement: Long-Term Management of Liquid High-Level Radioactive Wastes Stored at the Western New York Nuclear Services Center, West Valley," dated June 1982
40 CFR §§ 1500 -1508	U.S. Council on Environmental Quality, "Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act," dated July 1, 1986
42 U.S.C. 4321 et seq.	U.S. Congress, National Environmental Policy Act, as Amended, dated January 1, 1970
HB:85:0108	C.J. Roberts to L.H. Rankin, "Transmittal of Environmental Checklists to MRC ['CPC Storage Area Site Work' (HB:85:0075), and 'Operation of Abrasive Water Jet System for Sectioning Fuel Storage Canisters' (ED:85:0058)]," dated May 21, 1985

**Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications**

ID-WVDP-94-16	Letter WD:94:1030, L.C. Salvatori to T.J. Rowland, "Retransmittal of Environmental Checklist 94-16, 'Chemical Process Cell Waste Storage Area Enclosure Replacement,'" categorically excluded September 28, 1994
IH:99:0059	M.A. Wright to R.E. Lawrence, "CPC-WSA Risk Management Plan," dated December 22, 1999
OH-WVDP-1999-03	Letter DW:1999:0505, D.W. Sullivan to R.R. Campbell, "Environmental Checklist OH-WVDP-1999-03, 'Remote-Handled Waste Project,'" dated July 23, 1999
Public Law 96-368	U.S. Congress, West Valley Demonstration Project Act (S.2443), dated October 1, 1980
6 NYCRR § 201	New York State Department of Environmental Conservation, "Construction and Operating Permits," dated June 7, 1996
6 NYCRR § 228	New York Department of Environmental Conservation, "Surface Coating Processes," dated July 24, 1979
6 NYCRR § 373-3	New York Department of Environmental Conservation, Division of Solid & Hazardous Materials, "Interim Status Standards for Owners and Operators of Hazardous Waste Facilities," effective November 28, 1998
SOP 009-12	West Valley Nuclear Services Company, "Solid Waste Management and Material Reuse and Recycling," revision 4, dated April 18, 2000
SOP 300-07	West Valley Nuclear Services Company, "Waste Status Determination," revision 10, dated December 29, 1999
SOP 300-11	West Valley Nuclear Services Company, "Off-Site Transportation of Industrial Waste and Recyclable Material," revision 5, dated February 28, 2000
SOP OH-6.1.01	U.S. Department of Energy, Ohio Field Office, "National Environmental Policy Act Compliance," revision 1, dated July 7, 1995
10 CFR § 1021	U.S. Department of Energy, "National Environmental Policy Act Implementing Procedures; Final Rule," dated July 9, 1996

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

33 CFR §§ 323-325	U.S. Corps of Engineers, "Navigation and Navigable Waters," dated September 15, 1993
33 U.S.C. 1251 et seq.	U.S. Congress, Federal Water Pollution Control Act, as Amended [i.e., Clean Water Act], dated October 18, 1972
WV-916	West Valley Nuclear Services Company, "SARA Title III Section 311, #12, and 313 Reporting," revision 1, dated April 1, 1996
WVDP-RFI-023	West Valley Nuclear Services Company and Dames and Moore, "Resource Conservation and Recovery Act Facility Investigation Report, Volume 7, Chemical Process Cell Waste Storage Area," revision 0, dated December 20, 1996
WVDP-010	West Valley Demonstration Project, "Radiological Controls Manual," revision 15, dated November 5, 1999
WVDP-011	West Valley Demonstration Project, "WVDP Industrial Hygiene and Safety Manual," revision 15, dated June 25, 1999
WVDP-206	West Valley Demonstration Project, "Best Management Practices Plan Pursuant to Section 304(e) of the Clean Water Act," revision 0, dated December 19, 1997
WVDP-304	West Valley Demonstration Project, "Technical Basis for Contaminated Soil Management," revision 1, dated March 2, 1999
WVDP-336	West Valley Demonstration Project, "WVDP 1999-2001 Plan," dated October 21, 1998

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

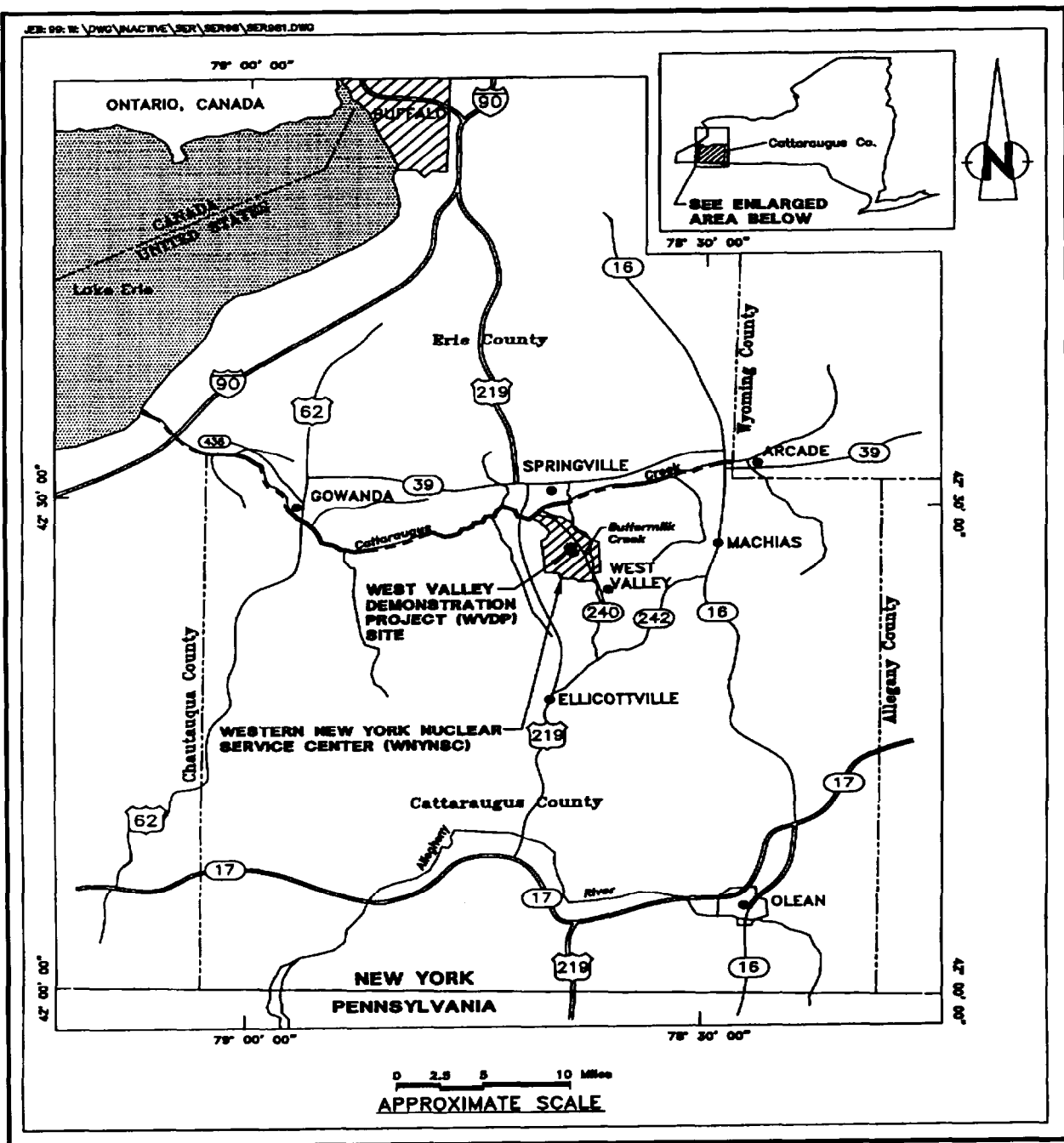


Figure 1. Western New York Nuclear Service Center (WNYNSC) and West Valley Demonstration Project (WVDP)

Attachment to Environmental Checklist 2000-03
Chemical Process Cell-Waste Storage Area (CPC-WSA) Modifications

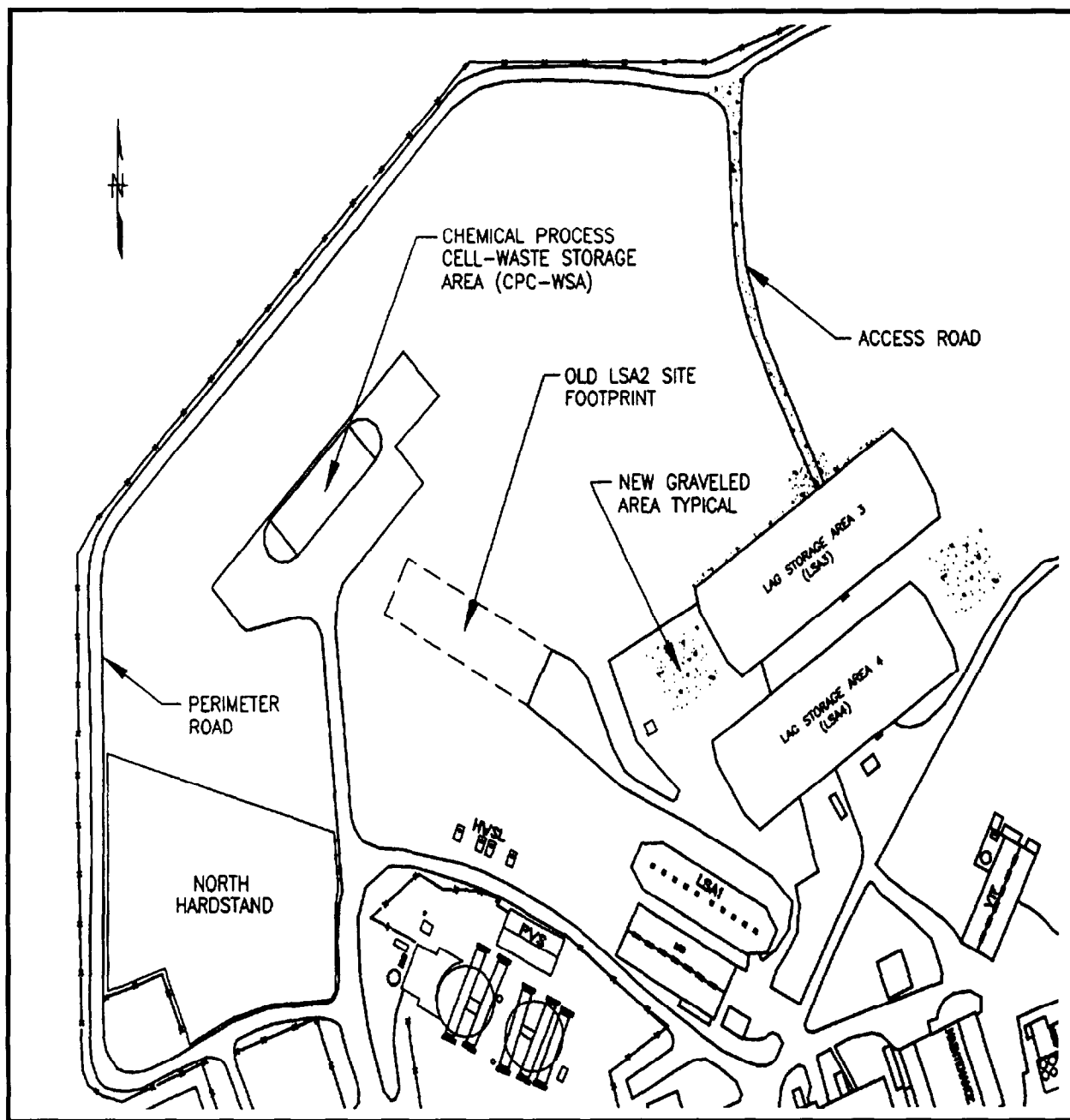


Figure 2. Location of Chemical Process Cell-Waste Storage Area (CPC-WSA) (Plan View)

DW:2000:0403

J. R. Gerber	AOC-24
D. P. Klenk	AOC-24
D. K. Ploetz	AOC-19
F. A. Tarantello	WV-B1C